

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MOBIL CERRO NEGRO, LTD.

Plaintiff,

v.

PDVSA CERRO NEGRO S.A.

Defendant.

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) Civil Action No. 07-CV-11590 (DAB)
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**DECLARATION OF EVAN GLASSMAN IN SUPPORT
OF PLAINTIFF'S MOTION TO CONFIRM
AND ENFORCE FOREIGN ARBITRATION AWARD**

I, Evan Glassman, hereby declare as follows:

1. I am a member of the law firm of Steptoe & Johnson LLP, counsel to Plaintiff Mobil Cerro Negro Ltd. ("Mobil CN") in the above-captioned action.

2. Attached hereto are true and correct copies of the following exhibits, which are submitted with Mobil CN's Motion to Confirm and Enforce Foreign Arbitration Award, and Mobil CN's Memorandum in support thereof:

Exhibit 1: Final Award from ICC Case No. 15416/JRF, issued on December 23, 2011

Exhibit 2: Cerro Negro Association Agreement among Mobil CN and Petróleos de Venezuela S.A. ("PDVSA") and PDVSA Cerro Negro S.A., dated October 28, 1997, with English translation

Exhibit 3: Guaranty of PDVSA, dated October 28, 1997, with English translation

Exhibit 4: Declaration of Miguel López Forastier, dated January 24, 2012

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on January 26, 2012.

s/ Evan Glassman
Evan Glassman